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7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8
9 JOSE VILLA FLORES,

Plaintiff,

11 vs.

12 TARGET CORPORATION, DOES 1 through
10 inclusive; ROE CORPORATIONS 11
13 through 20 inclusive,

14 Defendants.

CASE NO. 2:16-cv-01543-JCM-DJA

STIPULATION FOR
CONTINUANCE OF TRIAL DATE
(First Request)

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16 The above named parties, by and through their respective counsel of records, hereby
17 submit the following STIPULATION FOR CONTINUANCE OF TRIAL DATE (First Request).

18 Pursuant to LR IA 6-1 This is the first stipulation to continue the trial date of the above
19 captioned matter.

20 I. Reasons for Extension

21 Recently, it has come to the attention of counsel that Defendant's sole medical expert
22 witness has unexpectedly become unavailable during the time currently set for trial of this matter.
23 Further, despite Defendant's preference for live testimony, efforts have been made to schedule
24 a trial deposition to preserve this experts testimony for trial, however, such a deposition cannot
25 be scheduled prior to the trial date.

26 As this witness is the only witness that Defendant will be able to present to counter the
27 medical damages claim being asserted by Plaintiff, the parties have agreed to seek a short
28 continuance of the trial to assure live testimony, or at a minimum, be able to preserve the

1 testimony through trial deposition.

2 As such, the parties request that the trial currently scheduled to begin on January 27,
3 2020, be continued to the soonest available date for the Court beyond February 28, 2020.

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5 DATED this 10 day of January, 2020. DATED this 10 day of January, 2020.

6 HARRIS & HARRIS

PERRY & WESTBROOK,
a Professional Corporation

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8 By: /s/ Brian Harris
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By: /s/ Alan W. Westbrook
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13 This case is set for Jury Trial on the ~~fixed~~ stacked calendar on
14 April 6, 2020, at 9:00 a.m.. Calendar call will be held on
15 April 1, 2020, at 1:30 p.m..

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17 IT IS SO ORDERED.

18 Dated January 14, 2020.

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21 UNITED STATES DISTRICT JUDGE
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